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October 24, 2005

Mr. John F. Carter
Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 95105

**Re: Comments Regarding FDIC Application #20051977; Wal-Mart
Application for Insurance and Industrial Bank Charter**

Dear Mr. Carter:

I am writing to oppose the application of Wal-Mart Stores, Inc., for Federal deposit insurance coverage for an ILC charter in Utah. I am a community banker and believe strongly that allowing Wal-Mart to own a bank charter and potentially open branches in its network of stores would do irreparable harm to my community and my institution, and pose a severe systemic risk to our nation's economy.

I am aware that Wal-Mart has stated that it intends to operate a limited ILC charter in Utah. I am skeptical. Their assurances that the operation will remain narrow ring hollow in the context of the company's history and corporate philosophy. This is Wal-Mart's fourth attempt to get into the banking business. Wal-Mart's CEO says he wants to grow the company and provide financial services to its customers. It is not much of a stretch to conclude that somewhere down the road, Wal-Mart will be amending its business plan to allow it to offer a full array of banking services. This must not be allowed to happen.

Wal-Mart has a long history of destabilizing communities by undercutting prices of local merchants and driving them out of business. That is not a theory, it is a fact.

Wal-Mart did not open stores in those communities to be civic partners with local merchants; they opened stores to drive local merchants out of business and steal their customers, which is just what they did. The largest company in the world could do the same thing to community banks. The FDIC would be ill-advised to set this nation on a course that could result in the demise of the community banking industry as we know it today.

Congress has reaffirmed our nation's long standing policy against the mixing of banking and commerce, and with good reason. Mixing banking and commerce would create serious conflicts of interest and distort credit decisions. The impartial allocation of credit is the linchpin of our financial system and must be preserved. Would a Wal-Mart Bank

offer credit at reasonable terms to its competitors? Would Wal-Mart require its suppliers to bank at the Wal-Mart bank?

Even more importantly, the largest company in the world owning a bank would produce a dangerous concentration of economic power and resources that would pose severe systemic risks to our economy. Our nation cannot afford to take that risk to save Wal-Mart a couple of pennies on each credit and debit card transaction.

For the sake of the community banks of our nation and the customers and communities we serve, please do not allow Wal-Mart to get into the banking business. Make a statement for fair competition and consumer choice by denying Wal-Mart's application for deposit insurance.

Sincerely,

A handwritten signature in cursive script that reads "Carolyn May".

Carolyn May
Human Resources
Vice President



CITIZENS NATIONAL BANK

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For the sake of the community banks of our nation and the customers and communities we serve, please do not allow Wal-Mart to get into the banking business. Make a statement for fair competition and consumer choice by denying Wal-Mart's application for deposit insurance.

Sincerely,

A handwritten signature in black ink, reading "David Litton". The signature is written in a cursive, flowing style.

David Litton
Vice-President
Citizens National Bank



CITIZENS NATIONAL BANK

October 24, 2005

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Regional Director
Federal Deposit Insurance Corporation
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Wal-Mart has a long history of destabilizing communities by undercutting prices of local merchants and driving them out of business. That is not a theory, it is a fact. For example, when Wal-Mart entered Iowa, 50% of clothing stores, 30% of hardware stores, 42% of variety stores, 26% of department stores, and 25% of building materials stores were driven out of business. Were Iowa consumers well served by eliminating Wal-Mart's competitors and denying consumer choice? I think not. Think of the economic consequences of those statistics, and the impact it had on the state of Iowa! Communities recover from natural disasters; man-made ones are much longer lasting.

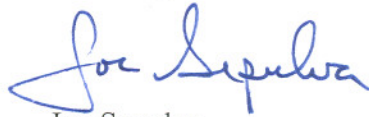
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Sincerely,



Joe Sepulva
Vice President
903/489-1999



CITIZENS NATIONAL BANK

2005 OCT 31 AM 9 55

October 24, 2005

Mr. John F Carter
Regional Director
FDIC
25 Jessie St, Ecker Square, Suite 2300
San Francisco, CA 95105

Re: Walmart Bank

Dear Mr. Carter:

I writing this letter in opposition to the Wal-Mart Stores, Inc. application for a Utah industrial bank or industrial loan company charter (ILC) and federal deposit insurance.

This application is a conflict between banking and commerce. It has been this way for the purpose creating a strong, safe and balanced economy.

To put it plainly, Wal-Mart will take their license to bank and use it the same way they have with their retail strategy. Just as the small stores have been forced out of business in the smaller communities, independent banks will suffer in the same way.

Please deny the Wal-Mart Stores, Inc application for an ILC.

Sincerely,

Cliff Bomer
Vice President

**SAMPLE LETTER OPPOSING WAL-MART APPLICATION
FOR DEPOSIT INSURANCE AND ILC CHARTER**

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Sincerely,



Linda Cooper
Teller Operations
Citizens National Bank
South 79 Branch
903-657-1444 Ext. 25
Fax 903-657-4326

LCooper@cnbtxas.com